# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE DIET DRUGS (PHENTERMINE/FENFLURAMINE/ DEXFENEFLURAMINE) PRODUCTS LIABILITY LITIGATION

MDL DOCKET NO. 1203

MARY F. SANDERS. SUE BOLDEN. BETTY J. DAVIS, BOBBIE F. LOVE, LASONYA THOMAS, SANDRA J. SPINDLER, NANCY RACHAL, KINLEY WILSON, MARCIA WOODS, THERIAL TAYLOR, SHARON D. HOLLAND-SIMS, JOHN L. PATE, TRACI JOHNSON, KAY CUNNINGHAM. PEGGIE BUTLER, SANDRA BEAVER, HARRY L. BEAVER, AMANDA J. BEAVER, VIRGINIA R WILLIAMS, JACQUELINE FRYE, FAYE COOKE, HANNA MCCLURE, DOROTHY JEAN WASHINGTON, JACQUELINE MISTER, ELLOUISE EVANS, MARY ALICE ARNOLD, MARY MARGO BROCK, CINDY C. HOLDER, DEE ANDREWS, LALETA LANE REEVES, RHONDA R. JOHNSON, RHONDA SAUL EVANS. JO ANN MATHES. REBECCA LOU CARTER, DEBORAH C. GIUSTI, LORNA TEMPLE, GWEEN FORTUNE, FREDDY SHAW. VELDA YVETTA SMITH. SARAH DALE. ELENOR J. BARBEE. SENATRA R. IRBY, RUXANDRA OLARIV, PATRICIA G. HARWELL, NANCY ADELE RICHEY, DELORIS SAMPLE, PAMELA DEAN, MEKII N. McGEE AND CYNTHIA D. ADAMS **DESHONNON HUNT** 

**PLAINTIFFS** 

VS. MDL CIVIL ACTION NO. 02-20081

WYETH-AYERST PHARMACEUTICALS, INC., f/k/a Wyeth-Ayerst Laboratories, Inc., a division of American Home Products, Inc.; WYETH LABORATORIES, INC., A. H. ROBINS COMPANY, INC.; AMERICAN HOME PRODUCTS, INC.; ROY SMITH d/b/a STARKVILLE DISCOUNT DRUGS; SUPER SAV-ON-DRUGS of MISSISSIPPI, INC.; WAL-MART ASSOCIATES, INC.; MCR PHARMACEUTICALS INC., a/k/a American Pharmaceuticals, Inc., a/k/a MCR/American

Pharmaceuticals, Inc.; JONES MEDICAL

INDUSTRIES, a/k/a Abana Pharmaceuticals, Inc.;

QUALITEST PRODUCTS, INC.; EON LABS

MANUFACTURING, INC.; FISONS CORPORATION;

GATE PHARMACEUTICALS: INTERNEURON

PHARMACEUTICALS, INC.; MEDEVA PHARMACEUTICALS, INC.; RUGBY

LABORATORIES, INC.; SMITH-KLINE

BEECHAM CORPORATION; TYSON DRUGS, INC.;

Kenny Coleman d/b/a COLEMAN'S HEALTH MART

PHARMACY; RITE AIDHDQTRS. CORP.,

and GOLDLINE LABORATORIES, INC., a division

of IVAX Corporation

**DEFENDANTS** 

#### PLAINTIFFS' DESIGNATION OF CASE SPECIFIC EXPERTS

Plaintiffs Mary F. Sanders, et al., by and through counsel designate the following case specific expert witnesses:

Dr. Abdur Razzak Tai, Tri-County Doctors, Inc., 907 North Central Avenue, Kissimmee, Florida 34741 as a medical expert in the field of cardiology. A copy of Dr. Tai's experience, education, qualifications, and publications is attached hereto in the form of a curriculum vitae. Exhibit "A". Dr. Tai charges \$100.00 for echocardiogram interpretation and \$600.00 per hour for deposition and trial testimony. Dr. Tai does not maintain a record of his prior testimony.

Dr. Tai bases his opinion on his review and interpretation of the echocardiogram and doppler analysis performed on each Plaintiff, and his education and experience as a cardiologist.

A copy of Dr. Tai's signed report for each Plaintiff is attached hereto as cumulative Exhibit "B".

Dr. Tai may testify in the areas of cardiology; causation of Plaintiffs' medical condition and injuries and a description of the echocardiogram and doppler analysis performed on each Plaintiff and the results of that testing.

Dr. Tai is expected to testify that his review and interpretation of each Plaintiffs' echocardiogram and doppler analysis revealed that each Plaintiff suffered from the medical

conditions listed in Dr. Tai's signed report for each Plaintiff as reflected in Exhibit "B". Dr. Tai's testimony is expected to be consistent with his interpretation and final conclusions indicated in his signed reports attached as Exhibit "B".

RESPECTFULLY SUBMITTED this the day of August, 2002.

MARY F. SANDERS, SUE BOLDEN, BETTY J. DAVIS, BOBBIE F. LOVE, LASONYA THOMAS, SANDRA J. SPINDLER, NANCY RACHAL, KINLEY WILSON, MARCIA WOODS, THERIAL TAYLOR, SHARON D. HOLLAND-SIMS, JOHN L. PATE, TRACI JOHNSON, KAY CUNNINGHAM, PEGGIE BUTLER, SANDRA BEAVER, HARRY L. BEAVER, AMANDA J. BEAVER, VIRGINIA R WILLIAMS, JACQUELINE FRYE, FAYE COOKE, HANNA MCCLURE, DOROTHY JEAN WASHINGTON, JACQUELINE MISTER, ELLOUISE EVANS, MARY ALICE ARNOLD, MARY MARGO BROCK, CINDY C. HOLDER, DEE ANDREWS, LALETA LANE REEVES, RHONDA R. JOHNSON, RHONDA SAUL EVANS, JO ANN MATHES, REBECCA LOU CARTER, DEBORAH C. GIUSTI, LORNA TEMPLE, GWEEN FORTUNE, FREDDY SHAW, VELDA YVETTA SMITH, SARAH DALE, ELENOR J. BARBEE, SENATRA R. IRBY, RUXANDRA OLARIV. PATRICIA G. HARWELL, NANCY ADELE RICHEY, DELORIS SAMPLE, PAMELA DEAN, MEKII N. McGEE, CYNTHIA D. ADAMS, and DESHONNON HUNT

Ву:\_\_\_\_\_

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#### CERTIFICATE OF SERVICE

This is to certify that I have this day mailed a true and correct copy of the above and foregoing Plaintiffs' Designation of Generic Experts, postage prepaid, by means of United States Mail to the following counsel of record:

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This the	day of August, 2002		
	_	H. GRAY LAIRD, III	